

EXHIBIT E

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**DECLARATION OF DEVIN WILLIS IN SUPPORT OF PLAINTIFFS’ SUBMISSION
REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

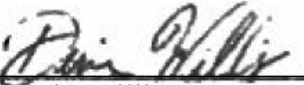
I, Devin Willis, declare as follows:

1. I am a Plaintiff in the lawsuit captioned *Sines v. Kessler*, No. No. 3: 17-cv-00072-NKM.
2. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.
3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.
4. I chose to file this lawsuit in Charlottesville, Virginia, because that is where the Defendants harmed me.
5. In August 2017, when the events at issue in this case took place, I was an undergraduate student at the University of Virginia ("UVA"). I was entering my sophomore year of college. I received my bachelor's degree from UVA in the spring of 2020, although I refrained from attending my college graduation in-person in part because I was scared to return to Virginia.
6. After receiving my bachelor's degree, I left the United States. I continue to live abroad.
7. I am planning to return to the United States to attend the trial in-person. I anticipate that returning to Virginia for the trial will be difficult for me.
8. It is important to me to conduct this trial in the place where I was injured, to hear a jury of my peers render a verdict regarding the Defendants' conduct, who planned this event in my new home. After the events in this case occurred, I felt like a stranger in Charlottesville, the town that was my new home. I filed this case because I hoped that doing so would help me

regain the sense that I was welcome in the community that I lived in for such an important part of my life. If the trial takes place outside of Charlottesville, I will lose the thing I most hoped to gain by bringing this lawsuit in the first place.

9. Despite my anxiety, I am planning to attend the trial in-person in Charlottesville because I want to participate fully and because I know I can look to my community of friends in Charlottesville to support me emotionally during what is certain to be a difficult time. I will also be relying on them for material support, including housing and transportation during the trial. If the trial takes place outside of Charlottesville, I could incur substantial costs to pay for assistance that is available to me in Charlottesville for free. I have been living paycheck to paycheck since the spring of 2020 and cannot afford to pay for housing or transportation during the trial.

10. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2021 in Mexico City, Mexico.


Devin Willis